

# **EXHIBIT N**

1 IN THE UNITED STATES DISTRICT COURT FOR  
2 THE DISTRICT OF SOUTH CAROLINA  
3 GREENVILLE DIVISION  
4 CASE NO. 6:13-CV-2428-JD  
5

6 UNITED STATES ex rel.  
7 CHARLES R. SHEPHERD, DANNY V. RUDE,  
8 Scott Dillard, AND RICKEY MACKEY,  
9 Plaintiffs/Realtors,  
10

11 V.  
12

13 FLUOR CORPORATION INC., ET AL.,  
14 Defendants  
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23 DEPONENT: BRADLEY HAMM

24 DATE: FEBRUARY 7, 2024

25 REPORTER: ELIZABETH JAREMKO

1 all?

2 A. I'm sure.

3 Q. Did you ever --

4 A. I don't know that one specific, so I can't say  
5 that, but --

6 Q. Do you recall ever trying to search for  
7 anything on the Sametime system?

8 A. No, sir.

9 Q. So if you go to the beginning of this chat  
10 transcript, you see your name, and then it says, "Sorry,  
11 boss. Yesterday it went to hell in a handbasket, and I  
12 got little to no desk time"; you see that?

13 A. Yes, sir.

14 Q. And then the next entry is you saying, "Trying  
15 to get everything in line before GPA hits ground.  
16 Hopefully, enough BAND-AIDS applied." What did you mean  
17 by that?

18 A. So getting -- getting the visual stuff, shelf  
19 locations. Earlier I talked to you -- I testified on  
20 covering proper dunnage and stuff in laydown yards. So  
21 not definitively what we would have done by MMP, but to  
22 make sure we had compliance overall.

23 Q. And then if you go down, you see Mr. Jones  
24 says, "What up, bro?" And then you respond, "I've never  
25 seen so much straight-up fraud in my LOGCAP life"; see

1 that?

2 A. Yes, sir.

3 Q. And what did you mean by that?

4 A. I'm sorry. I -- I laugh because this is the  
5 way me and Juan talked to each other. So basically, you  
6 could call it locker room talk, however you want to --  
7 to say it. So again, I said I -- I used the word fraud,  
8 and not meaning fraud to government, but this would be a  
9 prime example of what I was talking about earlier in my  
10 testimony. So just -- just the fact that it just wasn't  
11 done to the level of what I thought it should have been  
12 done, and what we -- we had as a floor standard in the  
13 MMP.

14 Q. So this, your words here, say, "I've never  
15 seen so much straight-up fraud in my LOGCAP life." And  
16 that isn't saying anything about smoking a cigarette  
17 when you shouldn't be, right? Correct?

18 A. Correct, sir.

19 Q. Right. And so when you say, "Straight-up  
20 fraud," that strikes me as something different than what  
21 you're referring to when you say any small thing that  
22 was out of line you would call fraud.

23 MS. LOLLAR: Counsel, is there a question?

24 BY MR. TWETTEN:

25 Q. Is that a fair characterization of what you